



RECEIVED

BellSouth Telecommunications, Inc.
Suite 2101
333 Commerce Street
Nashville, TN 37201-3300

guy.hicks@bellsouth.com

Guy M. Hicks
General Counsel
2003 DEC 4 PM 4:09

615 214-6301
Fax 615 214-7406
T.R.A. DOCKET ROOM

December 4, 2003

VIA HAND DELIVERY

Hon. Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Implementation of the Federal Communications Commission's Triennial
Review Order (Nine-month Proceeding)(Switching)*
Docket No. 03-00491

Dear Chairman Tate:

Enclosed are the original and fourteen copies of the non-proprietary portion of BellSouth's Second Supplemental Response to AT&T's First Interrogatories to BellSouth, Items 43 and 87. The proprietary portion, response to Item 85, is being submitted under separate cover and subject to the terms of the Protective Order entered in this docket.

Copies of the enclosed are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch

BEFORE THE TENNESSEE REGULATORY AUTHORITY

In Re:)	
)	Docket No. 03-00491
IMPLEMENTATION OF THE FEDERAL)	
COMMUNICATIONS COMMISSION'S)	
TRIENNIAL REVIEW ORDER – 9)	
MONTH PROCEEDING – SWITCHING)	

**BELLSOUTH TELECOMMUNICATIONS, INC.'S SECOND SUPPLEMENTAL
RESPONSES TO AT&T COMMUNICATIONS OF THE SOUTH CENTRAL
STATES, LLC'S FIRST SET OF INTERROGATORIES**

BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits the following second set of supplemental responses to the First Set of Interrogatories served by AT&T Communications of the South Central States, LLC's ("AT&T") dated October 27, 2003 and states as follow:

BellSouth incorporates herein by reference all of its general and specific objections filed on November 6, 2003. Any responses provided by BellSouth in response to this discovery will be provided subject to and without waiving any of BellSouth's previously filed objections

SUPPLEMENTAL RESPONSES

REQUEST: Does BellSouth have logs, studies or other records documenting the time required by its employees to complete all or some of the tasks associated with either the individual hot cut process or the bulk hot cut process? If yes, in what form does BellSouth maintain such records (e.g. electronically, on paper)? In addition, please list each task for which completion time is logged or recorded in a study.

RESPONSE: The records documenting the time it takes BellSouth employees to perform hot cuts is captured in the performance measures and underlying data discussed in BellSouth's response to AT&T's First Set of Interrogatories, Item No. 39, which is readily available to AT&T. This data captures all hot cuts whether ordered via the individual process or the batch process. BellSouth also has completed a cost study for the batch hot cut process as defined in the UNE-P to UNE-L Bulk Migration document found in the CLEC Information Package, which includes work times associated with the tasks in performing the batch hot cut process. Cost Study information is available via the following URL link:

<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-04/>

The file name format is GA_INTER_ATTACH_43.ZIP.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 03-00491

AT&T's 1st Interrogatories

October 27, 2003

SUPPLEMENTAL RESPONSE Item No. 85

Page 1 of 2

PUBLIC

REQUEST: Provide for each calendar year from 1999 through 2002 separately for each type of collocation (i.e. caged physical, cageless physical, virtual, other) the total square footage and number of collocations in BellSouth's nine-state region and the total annual revenue collected for each type of collocation.

SUPPLEMENTAL RESPONSE:

BellSouth does not have total square footage separated by type of collocation (i.e., caged physical, cageless physical, virtual and other) for each central office, end office and wire center in its nine-state region. See BellSouth's Supplemental response to AT&T's First Set of Interrogatories, Item No. 40 for information concerning the approximate square footage of collocation floor space for each individual CO, end office and serving wire center in BellSouth's nine-state region in which there are currently collocators. BellSouth designates individual CO, end office and serving wire center floor space as "collocation space" when it is assigned to a collocator that has submitted a valid collocation application. The floor space remains designated as "collocation space" until the carrier physically removes its equipment and the collocation arrangement is reduced or terminated.

SUPPLEMENTAL RESPONSE (CONT.):

<u>Year</u>	<u>Type of Collo Arrangement</u>	<u>Total No. of Collocations</u>
1999	Caged	637
	Cageless	575
	Virtual	338
	Other (Unidentified)	19
2000	Caged	1,626
	Cageless	2,734
	Virtual	384
	Other (Unidentified)	29
2001	Caged	1,551
	Cageless	2,658
	Virtual	392
	Other (Unidentified)	28
2002	Caged	1,291
	Cageless	2,542
	Virtual	391
	Other (Unidentified)	26

BellSouth does not separate collocation revenues between physical caged and physical cageless arrangements in its nine-state region, only between physical (which includes both caged and cageless) and virtual collocation. Listed below is the total physical and virtual collocation revenue for BellSouth's nine-state region for the period from 1999 through 2002.

<u>Year</u>	<u>Physical Revenues</u>	<u>Virtual Revenues</u>
1999		
2000		
2001		
2002		

This revenue information is proprietary and is provided pursuant to the terms of the parties' protective agreement.

BellSouth Telecommunications, Inc.

Tennessee Regulatory Authority

Docket No. 03-00491

AT&T's 1st Interrogatories

October 27, 2003

SUPPLEMENTAL RESPONSE Item No. 87

Page 1 of 1

REQUEST: Identify the number of BellSouth central offices in which more than one CLEC was collocated in BellSouth's nine-state region:

- a) As of December 31, 1996;
- b) As of December 31, 2000; and
- c) As of March 31, 2003.

SUPPLEMENTAL RESPONSE:

- a) 3
- b) 476
- c) 477

CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2003, a copy of the foregoing document was served on the parties of record, via the method indicated:

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Henry Walker, Esquire
Boult, Cummings, et al.
414 Union Street, #1600
Nashville, TN 37219-8062
hwalker@boultcummings.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Charles B. Welch, Esquire
Farris, Mathews, et al.
618 Church St., #300
Nashville, TN 37219
cwelch@farrismathews.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Martha M. Ross-Bain, Esquire
AT&T
1200 Peachtree Street, Suite 8100
Atlanta, Georgia 30309
rossbain@att.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Timothy Phillips, Esquire
Office of Tennessee Attorney General
P. O. Box 20207
Nashville, Tennessee 37202
timothy.phillips@state.tn.us

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

H. LaDon Baltimore, Esquire
Farrar & Bates
211 Seventh Ave. N, # 320
Nashville, TN 37219-1823
don.baltimore@farrar-bates.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

James Wright, Esq.
United Telephone - Southeast
14111 Capitol Blvd.
Wake Forest, NC 27587
james.b.wright@mail.sprint.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Ms. Carol Kuhnnow
Qwest Communications, Inc.
4250 N. Fairfax Dr.
Arlington, VA 33303
Carol.kuhnnow@qwest.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Jon E. Hastings, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062
jhastings@boultcummings.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Dale Grimes, Esquire
Bass, Berry & Sims
315 Deaderick St., #2700
Nashville, TN 37238-3001
dgrimes@bassberry.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Mark W. Smith, Esquire
Strang, Fletcher, et al.
One Union Square, #400
Chattanooga, TN 37402
msmith@sf-firm.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Nanette S. Edwards, Esquire
ITC^DeltaCom
4092 South Memorial Parkway
Huntsville, AL 35802
nedwards@itcdeltacom.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Guilford Thornton, Esquire
Stokes & Bartholomew
424 Church Street, #2800
Nashville, TN 37219
gthornton@stokesbartholomew.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Marva Brown Johnson, Esquire
KMC Telecom
1755 N. Brown Road
Lawrenceville, GA 30043
marva.johnson@kmctelecom.com

- ☐ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight
- ☒ Electronic

Ken Woods, Esquire
MCI WorldCom
6 Concourse Parkway, #3200
Atlanta, GA 30328
Ken.woods@mci.com

A handwritten signature in black ink, appearing to read "Ken Woods", is written over a horizontal line. The signature is stylized with a large, sweeping loop.